Michael A. Schwenk Jasper Engine Exchange, Inc. P. O. Box 650 Jasper, IN 47547-0650

Re: 037-12207

First Significant Permit Modification to Part 70 No.: T 037-7736-00089

Dear Michael A. Schwenk:

Jasper Engine Exchange, Inc. was issued a permit on December 31, 1998 for operation of an engine, transmission and differential parts re-manufacturing plant. A letter requesting changes to this permit was received on April 25, 2000. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consist of removal of permit conditions related to Kolene bath system and dust collectors as these equipment are removed from the existing plant.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Gurinder Saini, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Gurinder Saini or extension 3-0203, or dial (317) 233-0203.

Sincerely,

Paul Dubenetzky, Chief Permits Branch Office of Air Management

Attachments GS

cc: File - Dubois County

U.S. EPA, Region V

Dubois County Health Department Southwest Regional Office

Air Compliance Section Inspector - Gene Kelso

Compliance Data Section - Karen Nowak Administrative and Development - Janet Mobley Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT and ENHANCED NEW SOURCE REVIEW OFFICE OF AIR MANAGEMENT

Jasper Engine Exchange, Inc. 815 Wernsing Road Jasper, Indiana 47547

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T037-7736-00089						
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: December 31, 1998					
First Significant Permit Modification No.: T037-12207	Pages affected: 6, 7, 35 to 41					
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:					

- (9) two (2) natural gas fired reciprocating internal combustion engines, identified as DYN005 and DYN019, each with a rated heat input of 1.4 mmBtu/hr and a rated output of 200 HP;
- one (1) #2 diesel fuel fired reciprocating internal combustion engine, identified as DYN006, with a rated heat input of 1.75 mmBtu/hr and a rated output of 250 HP;
- (11) one (1) natural gas fired reciprocating internal combustion engine, identified as DYN007, with a rated heat input of 1.75 mmBtu/hr and a rated output of 250 HP;
- one (1) natural gas fired reciprocating internal combustion engine, identified as DYN008, using gasoline as back-up fuel, with a rated heat input of 3.5 mmBtu/hr and a rated output of 500 HP;
- (13) two (2) natural gas fired reciprocating internal combustion engines, identified as DYN010 and DYN018, each with a rated heat input of 0.84 mmBtu/hr and a rated output of 120 HP:
- one (1) natural gas fired reciprocating internal combustion engine, identified as DYN019, with a rated heat input of 1.4 mmBtu/hr and a rated output of 120 HP;
- (15) one (1) natural gas fired reciprocating internal combustion engine, identified as DYN028, using gasoline as back-up fuel, with a rated heat input of 10.5 mmBtu/hr and a rated output of 1500 HP;
- (16) two (2) baghouses, identified as DUC051 and DUC023, each with a gas flow rate of greater than 4,000 actual cubic foot per minute, for controlling grinding and machining operations with an uncontrolled potential particulate emissions of greater than 25 pounds per day.
- A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) one (1) natural gas fired boiler, rated at 4.5 mmBtu/hr;
- (2) thirteen (13) degreasing units, identified as D271-CLT21, D264-CLT054, G266-CLT056, I261, T264-CLT039, T263-CLT048, G273-CLT017, G274-CLT019, G271-CLT043, D262-CLT080, G264-CLT083, G276-CLT042 and T268-CLT044, constructed after July 1, 1990;
- eight (8) degreasing units, identified as T267-CLT051, G265, G263-CLT038, G272-CLT018, G270, D268-CLT020, D270-PEQ011 and D265-CLT053, constructed after January 1, 1980 and prior to July 1, 1990;
- (4) twenty (20) degreasing units constructed prior to January 1, 1980;
- (5) miscellaneous aerosol spray operations throughout the plant;
- (6) miscellaneous non-aerosol cleaning and machining operations throughout the plant;
- (7) GPL final wash usages throughout the plant;

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- (8) five (5) baghouses, identified as BLA007, BLA009, BLA011, BLA017 and BLA018, each with design outlet grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate of less than or equal to 4,000 actual cubic foot per minute, for controlling the sand blasting operations;
- (9) six (6) baghouses, identified as DUC001, DUC002, DUC015, DUC021, DUC027 and DUC052, each with design outlet grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate of less than or equal to 4,000 actual cubic foot per minute except DUC052 which has a flow rate of 15,000 actual cubic foot per minute, for controlling the grinding and machining operations, including deburring, buffing, polishing and abrasive blasting;
- (10) two (2) baghouses (ID Nos. DUC006 and DUC029), each with a gas flow rate of greater than 4,000 actual cubic foot per minute, for controlling grinding and machining operations with uncontrolled potential particulate emissions of less than 25 pounds per day; and

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22).

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SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(16) two (2) baghouses, identified as DUC051 and DUC023, each with a gas flow rate of greater than 4,000 actual cubic foot per minute, for controlling grinding and machining operations with an uncontrolled potential particulate emissions of greater than 25 pounds per day.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3]

(a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from Baghouses DUC051 and DUC023 shall not exceed 0.6 and 0.82 pounds per hour, respectively, when operating at a process weight rate of 3000, and 4000 pounds per hour, respectively.

The above pounds per hour limitations were calculated with the following equation:

 $E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

Compliance Determination Requirements

D.3.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.4 Particulate Matter (PM)

The baghouses and wet scrubber for PM control shall be in operation at all times when the grinding and machining, and the salt bath metal cleaning system are in operation and exhausting to the outside atmosphere.

D.3.5 Visible Emissions Notations

(a) Daily visible emission notations of the stack exhausts for Baghouses DUC051 and DUC023 shall be performed during normal daylight operations when venting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.3.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the grinding and machining processes, at least once weekly when the grinding and machining processes are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across each of the baghouses shall be maintained within the range of 1.0 and 6.0 inches of water, or the ranges established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM and shall be calibrated at least once every six (6) months.

D.3.7 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.3.8 Broken or Failed Bag/Wet Scrubber Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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Record Keeping Requirement [326 IAC 2-7-5(3)]

D.3.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.3.4 and D.3.5, the Permittee shall maintain records of daily visible emission notations of the baghouse stack exhausts.
- (b) To document compliance with Condition D.3.6, the Permittee shall maintain the following:
 - (1) Weekly records of the following operational parameters during normal operation:
 - (A) Inlet and outlet differential static pressure for baghouses and wet scrubber;
 - (B) Cleaning cycle for baghouses: frequency and differential pressure; and
 - (2) Documentation of all response steps implemented, per event .
 - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
 - (8) Documentation of the dates vents are redirected.
- (c) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

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SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Section D.4 is for the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) one (1) natural gas fired boiler, rated at 4.5 mmBtu/hr;
- (2) thirteen (13) degreasing units, identified as D271-CLT21, D264-CLT054, G266-CLT056, I261, T264-CLT039, T263-CLT048, G273-CLT017, G274-CLT019, G271-CLT043, D262-CLT080, G264-CLT083, G276-CLT042 and T268-CLT044, constructed after July 1, 1990;
- (3) eight (8) degreasing units, identified as T267-CLT051, G265, G263-CLT038, G272-CLT018, G270, D268-CLT020, D270-PEQ011 and D265-CLT053, constructed after January 1, 1980 and prior to July 1, 1990;
- (4) twenty (20) degreasing units constructed prior to January 1, 1980;
- (5) miscellaneous aerosol spray operations throughout the plant;
- (6) miscellaneous non-aerosol cleaning and machining operations throughout the plant;
- (7) GPL final wash usages throughout the plant;
- (8) five (5) baghouses, identified as BLA007, BLA009, BLA011, BLA017 and BLA018, each with design outlet grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate of less than or equal to 4,000 actual cubic foot per minute, for controlling the sand blasting operations;
- (9) six (6) baghouses, identified as DUC001, DUC002, DUC015, DUC021, DUC027 and DUC052, each with design outlet grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate of less than or equal to 4,000 actual cubic foot per minute except DUC052 which has a flow rate of 15,000 actual cubic foot per minute, for controlling the grinding and machining operations, including deburring, buffing, polishing and abrasive blasting;
- three (3) baghouses (ID Nos. DUC006 and DUC029), each with a gas flow rate of greater than 4,000 actual cubic foot per minute, for controlling grinding and machining; and operations with uncontrolled potential particulate emissions of less than 25 pounds per day.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating, the PM emissions from the 4.5 mmBtu per hour heat input boiler shall be limited to 0.6 pounds per mmBtu heat input. The allowable emission is calculated using the following equation:

 $Pt = 1.09 / Q^{0.26}$

where: Pt is the allowable emissions in lb/mmBtu; and Q equals to total rated capacity of source heating capacity in mmBtu/hr.

D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for Degreasers T267-CLT051, G265, G263-CLT038, G272-CLT018, G270, D268-CLT020, D270-PEQ011 and D265-CLT053, Jasper Engine Exchange, Inc. shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements:

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(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a matter that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.4.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for Degreasers D271-CLT21, D264-CLT054, G266-CLT056, I261, T264-CLT039, T263-CLT048, G273-CLT017, G274-CLT019, G271-CLT043, D262-CLT080, G264-CLT083, G276-CLT042 and T268-CLT044, Jasper Engine Exchange, Inc. shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), for degreasers constructed after July 1, 1990, the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.4.4 Volatile Organic Compounds (VOC)

Any change or modification which may increase VOC usage for aerosol spray operations or non-aerosol cleaning and GPL final wash operations performed outside the spray booths to 25 tons per year shall require OAM's prior approval before such change can take place.

D.4.5 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rates from the grinding, machining and salt bath cleaning operations at associated maximum process weight rates are listed as follows:

ID#	Process Wt. Rate (lb/hr)	Emission Limit (lb/hr)	ID#	Process Wt. Rate (lb/hr)	Emission Limit (lb/hr)
BLA007	1,782	0.48	DUC052	1,500	0.42
BLA009	1,782	0.48	DUC052	2,000	0.42
BLA011	1,782	0.48	DUC015	1,000	0.32
BLA017	1,782	0.48	DUC052	2,000	0.42
BLA018	1,782	0.48	DUC051	2,500	0.60
DUC001	1,800	0.48	DUC021	600	0.23
DUC002	800	0.28	DUC027	800	0.28
DUC052	2,000	0.42	DUC029	2,500	0.60
DUC006	2,000	0.51			

The allowable emissions are calculated using the following equation:

 $E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour.

Except for DUC051, whose emissions were held to the lowest allowable rate determined for 1000 lb/hour process weight rate.

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Compliance Determination Requirement

D.4.6 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limits specified in Condition D.4.5 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.7 Visible Emissions Notations

- (a) Daily visible emission notations of the stack exhausts for Baghouse BLA017, BLA018, DUC001, DUC027 and DUC030 shall be performed during normal daylight operations when venting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping Requirement [326 IAC 2-7-5(3)]

D.4.8 Record Keeping Requirements

- (a) To document compliance with Condition D.4.5, the Permittee shall maintain records of daily visible emission notations of the baghouse stack exhausts.
- (b) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Significant Permit Modification, to a Part 70 Operating Permit

Source Background and Description

Source Name: Jasper Engine Exchange, Inc.

Source Location: 815 Wernsing Road, Jasper, IN 47547

County: Dubois SIC Code: 3714

Operation Permit No.: T 037-7736-00089
Operation Permit Issuance Date: December 31, 1998
Permit Modification No.: T 037-12207-00089
Permit Reviewer: Gurinder Saini

The Office of Air Management (OAM) has reviewed a modification application from Jasper Engine Exchange, Inc. relating to the operation of an engine, transmission and differential parts remanufacturing plant.

History

On April 25, 2000, Jasper Engine Exchange, Inc. submitted an application to the OAM requesting to remove conditions related to Kolene bath system and dust collectors as these equipment are removed from the existing plant. Jasper Engine Exchange, Inc. was issued a Part 70 permit on December 31, 1998. The permit shall be amended as follows (language deleted is shown with a line through it, language added is shown in bold):

- 1. The Kolene salt bath metal cleaning system, using a wet scrubber, identified as KOL003 has been discontinued and the system is being dismantled and removed from the plant. Remove all permit requirements for the Kolene salt bath system and wet scrubber. Source summary under A.2 (17) of the permit is modified as follows:
 - A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]
 - (17) one (1) salt bath metal cleaning system, using a wet scrubber, identified as KOL003, for particulate emissions control.
- Eight (8) old dust collectors identified as DUC004, DUC005, BLA009, DUC003, DUC014, DUC018 and DUC031 are removed. A new dust collector identified as DUC051 of 20,000 cfm capacity and 99.5% efficiency is installed as replacement for the old 8 units, exhausting inside the building. Accordingly conditions A.2 (16), A.3 (8) and A.3 (9) are modified as follows:
 - A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]
 - (16) three (3) two (2) baghouses, identified as DUC004, DUC005 DUC051 and DUC023, each with a gas flow rate of greater than 4,000 actual cubic foot per minute, for controlling grinding and machining operations with an uncontrolled potential particulate emissions of greater than 25 pounds per day.; and

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A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)], [326 IAC 2-7-5(15)]

- (8) five (5) four (4) baghouses, identified as BLA007, BLA009 BLA011, BLA017 and BLA018, each with design outlet grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate of less than or equal to 4,000 actual cubic foot per minute, for controlling the sand blasting operations;
- (9) seventeen (17) twelve (12) baghouses, identified as DUC001, DUC002, DUC003, DUC013, DUC014, DUC015, DUC017, DUC018, DUC019, DUC021, DUC022, DUC024, DUC027, DUC028, DUC030, DUC031 and DUC035, each with design outlet grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate of less than or equal to 4,000 actual cubic foot per minute, for controlling the grinding and machining operations, including deburring, buffing, polishing and abrasive blasting;

Section D.3 and D.4 of the permit are modified as follows because of two modifications described above:

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (16) three (3) two (2) baghouses, identified as DUC004, DUC005 DUC051 and DUC023, each with a gas flow rate of greater than 4,000 actual cubic foot per minute, for controlling grinding and machining operations with an uncontrolled potential particulate emissions of greater than 25 pounds per day.
- (17) one (1) salt bath metal cleaning system, using a wet scrubber, identified as KOL003, for particulate emissions control.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3]

- (a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from Baghouses DUC004, DUC005 DUC051 and DUC023 shall not exceed 0.68, 0.68 0.32 and 0.82 pounds per hour, respectively, when operating at a process weight rate of 3000, 3000, and 4000 pounds per hour, respectively.
- (b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the salt bath metal cleaning system shall not exceed 12.1 pounds per hour, when operating at a process weight rate of 10,000 pounds per hour.

The above pounds per hour limitations were calculated with the following equation:

 $E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

Compliance Determination Requirements

D.3.3 __Testing Requirements [326 IAC 2-7-6(1)(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.4 Particulate Matter (PM)

The baghouses and wet scrubber for PM control shall be in operation at all times when the grinding and machining, and the salt bath metal cleaning system are in operation and exhausting to the outside atmosphere.

D.3.5 Visible Emissions Notations

- (a) Daily visible emission notations of the stack exhausts for Baghouses DUC004, DUC005 DUC051 and DUC023, and wet scrubber KOL003 shall be performed during normal daylight operations when venting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.3.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the grinding and machining processes, as well as the water flow rate and total static pressure drop across the wet scrubber used in conjunction with the salt bath metal cleaning system, at least once weekly when the grinding and machining or salt bath cleaning-processes are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across each of the baghouses shall be maintained within the range of 1.0 and 6.0 inches of water and the water flow rate and pressure drop across the wet scrubber shall be maintained within the ranges of 90 to 125 gallons per minute and 19 and 23 inches of water, respectively, or the ranges established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C -

Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM and shall be calibrated at least once every six (6) months.

D.3.7 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.3.8 Broken or Failed Bag/Wet Scrubber Detection

In the event that bag or wet scrubber failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping Requirement [326 IAC 2-7-5(3)]

D.3.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.3.4 and D.3.5, the Permittee shall maintain records of daily visible emission notations of the baghouse stack exhausts.
- (b) To document compliance with Condition D.3.6, the Permittee shall maintain the following:
 - (1) Weekly records of the following operational parameters during normal operation:
 - (A) Inlet and outlet differential static pressure for baghouses and wet scrubber;
 - (B) Cleaning cycle for baghouses: frequency and differential pressure; and
 - (C) Wet scrubber water flow rate.
 - (2) Documentation of all response steps implemented, per event .
 - Operation and preventive maintenance logs, including work purchases orders, shall be maintained.

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- (4) Quality Assurance/Quality Control (QA/QC) procedures.
- (5) Operator standard operating procedures (SOP).
- (6) Manufacturer's specifications or its equivalent.
- (7) Equipment "troubleshooting" contingency plan.
- (8) Documentation of the dates vents are redirected.
- (c) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

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SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Section D.4 is for the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) one (1) natural gas fired boiler, rated at 4.5 mmBtu/hr;
- (2) thirteen (13) degreasing units, identified as D271-CLT21, D264-CLT054, G266-CLT056, I261, T264-CLT039, T263-CLT048, G273-CLT017, G274-CLT019, G271-CLT043, D262-CLT080, G264-CLT083, G276-CLT042 and T268-CLT044, constructed after July 1, 1990;
- (3) eight (8) degreasing units, identified as T267-CLT051, G265, G263-CLT038, G272-CLT018, G270, D268-CLT020, D270-PEQ011 and D265-CLT053, constructed after January 1, 1980 and prior to July 1, 1990;
- (4) twenty (20) degreasing units constructed prior to January 1, 1980;
- (5) miscellaneous aerosol spray operations throughout the plant;
- (6) miscellaneous non-aerosol cleaning and machining operations throughout the plant;
- (7) GPL final wash usages throughout the plant;
- (8) five (5) four (4) baghouses, identified as BLA007, BLA009, BLA011, BLA017 and BLA018, each with design outlet grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate of less than or equal to 4,000 actual cubic foot per minute, for controlling the sand blasting operations;
- (9) seventeen (17) twelve (12) baghouses, identified as DUC001, DUC002, DUC003, DUC013, DUC014, DUC015, DUC017, DUC018, DUC019, DUC021, DUC022, DUC024, DUC027, DUC028, DUC030, DUC031 and DUC035, each with design outlet grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate of less than or equal to 4,000 actual cubic foot per minute, for controlling the grinding and machining operations, including deburring, buffing, polishing and abrasive blasting;
- (10) three (3) baghouses (ID Nos. DUC006, DUC020 and DUC029), each with a gas flow rate of greater than 4,000 actual cubic foot per minute, for controlling grinding and machining; and operations with uncontrolled potential particulate emissions of less than 25 pounds per day.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating, the PM emissions from the 4.5 mmBtu per hour heat input boiler shall be limited to 0.6 pounds per mmBtu heat input. The allowable emission is calculated using the following equation:

$$Pt = 1.09 / Q^{0.26}$$

where: Pt is the allowable emissions in lb/mmBtu; and Q equals to total rated capacity of source heating capacity in mmBtu/hr.

D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for Degreasers T267-CLT051, G265, G263-CLT038, G272-CLT018, G270, D268-CLT020, D270-PEQ011 and D265-CLT053, Jasper Engine Exchange, Inc. shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

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- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a matter that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.4.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for Degreasers D271-CLT21, D264-CLT054, G266-CLT056, I261, T264-CLT039, T263-CLT048, G273-CLT017, G274-CLT019, G271-CLT043, D262-CLT080, G264-CLT083, G276-CLT042 and T268-CLT044, Jasper Engine Exchange, Inc. shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

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- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), for degreasers constructed after July 1, 1990, the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.4.4 Volatile Organic Compounds (VOC)

Any change or modification which may increase VOC usage for aerosol spray operations or non-aerosol cleaning and GPL final wash operations performed outside the spray booths to 25 tons per year shall require OAM's prior approval before such change can take place.

D.4.5 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rates from the grinding, machining and salt bath cleaning operations at associated maximum process weight rates are listed as follows:

	Process	Emission		Process	Emission		Process	Emission
ID#	Wt. Rate	Limit	ID#	Wt. Rate	Limit	ID#	Wt. Rate	Limit
	(lb/hr)	(lb/hr)		(lb/hr)	(lb/hr)		(lb/hr)	(lb/hr)
BLA007	1,782	0.48	DUC013	1,500	0.42	DUC022	1,200	0.37
			DUC051		0.32			
BLA009	1,782	1.48	DUC014	2,000	0.51	DUC024	200	0.11
DUC051		0.32	DUC051		0.32			
BLA011	1,782	0.48	DUC015	1,000	0.32	DUC027	800	0.28
BLA017	1,782	0.48	DUC017	2,000	0.51	DUC028	400	0.18
BLA018	1,782	0.48	DUC018	2,000	0.51	DUC029	2,500	0.60
			DUC051		0.32		•	
DUC001	1,800	0.48	DUC019	800	0.28	DUC030	1,500	0.42
DUC002	800	0.28	DUC020	2,500	0.60	DUC031	1,000	0.32
						DUC051		
DUC003	2,000	0.51	DUC021	600	0.23	DUC035	800	0.28
DUC006	2,000	0.51						

The allowable emissions are calculated using the following equation:

$$E = 4.10 P^{0.67}$$
 where $E =$ rate of emission in pounds per hour; and $P =$ process weight rate in tons per hour.

Except for DUC051, whose emissions were held to the lowest allowable rate determined for 1000 lb/hour process weight rate.

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Compliance Determination Requirement

D.4.6 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limits specified in Condition D.4.5 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.7 Visible Emissions Notations

- (a) Daily visible emission notations of the stack exhausts for Baghouse BLA009, BLA017, BLA018, DUC001, DUC027 and DUC030 shall be performed during normal daylight operations when venting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping Requirement [326 IAC 2-7-5(3)]

D.4.8 Record Keeping Requirements

- (a) To document compliance with Condition D.4.5, the Permittee shall maintain records of daily visible emission notations of the baghouse stack exhausts.
- (b) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

Existing Approvals

The source was issued a Part 70 Operating Permit T037-7736-00089 on December 31, 1998.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

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An application for the purposes of this review was received on April 25, 2000.

Emission Calculations

No emission calculations were carried out for this modification

Conclusion

The operation of this engine, transmission and differential parts re-manufacturing plant shall be subject to the conditions of the attached proposed Part 70 Permit No. T 037-12207-00089.

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for a Significant Permit Modification to a Part 70 Operating Permit

Source Name: Jasper Engine Exchange, Inc.

Source Location: 815 Wernsing Road, Jasper, IN 47547

County: Dubois SIC Code: 3714

Operation Permit No.: T 037-7736-00089
Operation Permit Issuance Date: December 31, 1998
Permit Modification No.: T 037-12207-00089
Permit Reviewer: Gurinder Saini

On July 26, 2000, the Office of Air Management (OAM) had a notice published in the Herald, Jasper, Indiana, stating that Jasper Engine Exchange, Inc. had applied for a Significant Permit Modification to a Part 70 Operating Permit to operate. The notice also stated that OAM proposed to issue a permit modification for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit modification should be issued as proposed.

On September 20, 2000, August Mack Environmental Inc. consultants for Jasper Engines Exchange Inc. submitted comments on the proposed Part 70 permit modification. Upon further review, the OAM has decided to make the following modifications to the permit (bolded language has been added, the language with a line through it has been deleted).

Comment 1

The exhaust airflow rate for baghouse unit DUC051 should be changed to 9,500 cfm from 20,000 cfm.

Response 1

This change is hereby recorded in the permit file. No change is necessary in permit language.

Comment 2

The baghouse BLA009 was not removed from the source. Therefore, insert all reference to this baghouse back in the permit.

Response 2

The conditions A.3 (8) and D.4 (8) are modified as follows:

(8) four **Five** (45) baghouses, identified as BLA007, **BLA009**, BLA011, BLA017 and BLA018, each with design outlet grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate of less than or equal to 4,000 actual cubic foot per minute, for controlling the sand blasting operations;

Comment 3

The baghouses DUC003, DUC013, DUC014 and DUC018 are replaced by a new baghouse DUC052 with airflow rate of 15,000 acfm. The baghouses DUC017, DUC019, DUC022, DUC024, DUC028, DUC030, DUC031 and DUC035 are permanently removed from the source.

Response 3

The conditions A.3 (9) and D.4 (9) are modified as follows:

(9) twelve six (126) baghouses, identified as DUC001, DUC002, DUC015, DUC017, DUC019, DUC021, DUC022, DUC024, DUC027, DUC028, DUC030-and DUC035, DUC052, each with design outlet grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate of less than or equal to 4,000 actual cubic foot per minute except DUC052 which has a flow rate of 15,000 actual cubic foot per minute, for controlling the grinding and machining operations, including deburring, buffing, polishing and abrasive blasting;

Comment 4

The baghouses DUC020 is replaced by new baghouse DUC051. Therefore reference to this baghouse is to be removed from the Permit.

Response 4

The conditions A.3 (10) and D.4 (10) are modified as follows:

(10) three two (32) baghouses (ID Nos. DUC006, DUC020 and DUC029), each with a gas flow rate of greater than 4,000 actual cubic foot per minute, for controlling grinding and machining operations with uncontrolled potential particulate emissions of less than 25 pounds per day; and

The conditions D.3.1 (a) and D.4.5 are modified to incorporate changes mentioned in above comments as follows:

The allowable PM emission rate (lb/hr) from the baghouses DUC051 and DUC052 will be 0.6 and 0.42 pounds per hour respectively. This limit is selected from the lowest allowable rate from the baghouses that these two are replacing.

D.3.1 Particulate Matter (PM) [326 IAC 6-3]

(a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from Baghouses DUC051 and DUC023 shall not exceed 0.32 **0.6** and 0.82 pounds per hour, respectively, when operating at a process weight rate of 3000, 3000, and 4000 pounds per hour, respectively.

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D.4.5 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rates from the grinding, machining and salt bath cleaning operations at associated maximum process weight rates are listed as follows:

i -								ı
	Process	Emission		Process	Emission		Process	Emission
ID#	Wt. Rate	Limit	ID#	Wt. Rate	Limit	ID#	Wt. Rate	Limit
	(lb/hr)	(lb/hr)		(lb/hr)	(lb/hr)		(lb/hr)	(lb/hr)
BLA007	1,782	0.48	DUC051	1,500	0.32	DUC022	1,200	0.37
	.,		DUC052	,,,,,,,	0.42		,	
DUC051	1,782	0.32	DUC051	2,000	0.32	DUC024	200	0.11
BLA009	ŕ	0.48	DUC052	,	0.42			
BLA011	1,782	0.48	DUC015	1,000	0.32	DUC027	800	0.28
DI 4047	4 700	0.40	DU0047	0.000	0.54	DITIONO	400	0.40
BLA017	1,782	0.48	DUC017	2,000	0.51	DUC028	400	0.18
BLA018	1,782	0.48	DUC051	2,000	0.32	DUC029	2,500	0.60
	ŕ		DUC052	,	0.42		,	
DUC001	1,800	0.48	DUC019	800	0.28	DUC030	1,500	0.42
DUC002	800	0.28	DUC020	2,500	0.60	DUC051	1,000	0.32
			DUC051					
DUC003	2,000	0.51	DUC021	600	0.23	DUC035	800	0.28
DUC052	-	0.42						
DUC006	2,000	0.51						
	,							

Further the OAM is making a correction in condition D.3.5 (a) which lists baghouse DUC051 twice. One of these references is deleted as follows:

D.3.5 Visible Emissions Notations

(a) Daily visible emission notations of the stack exhausts for Baghouses DUC051, DUC051 and DUC023 shall be performed during normal daylight operations when venting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.